



**U.S. Department of Justice**

***Michael J. Sullivan***  
*United States Attorney*  
*District of Massachusetts*

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Main Reception: (617) 748-3100

*John Joseph Moakley United States Courthouse*  
*1 Courthouse Way*  
*Suite 9200*  
*Boston, Massachusetts 02210*

March 1, 2005

By Facsimile Transmission

Catherine Byrne, Esq.  
Federal Defenders Office  
408 Atlantic Avenue  
Boston, MA 02109

Re: United States v. Miguel Ibarra  
No. 04-10075-PBS

Dear Ms. Byrne:

Yesterday (by facsimile) and this morning (by hand), I provided you with discovery related to a cooperating witness who yesterday entered a guilty plea and agreed to testify for the government in this case. I also provided copies of DEA-6 reports describing proffer sessions with two other government witnesses, at your request, though these disclosures are not required until Monday, March 7.

As we discussed, my 21-day discovery is due next Monday, March 7. As of that time, although I will be out of the office, I will be devoting significant time to preparing this case for trial (as will my co-counsel for trial, Denise Jefferson Casper, and support personnel in the U.S. Attorney's Office, as well as DEA agents assigned to this case). Accordingly, please be advised that, unless you notify the Court, in writing, of Mr. Ibarra's intention to plead guilty, by **noon on Monday, March 7**, I will strongly oppose any three-level reduction in his base offense level for early acceptance of responsibility should he

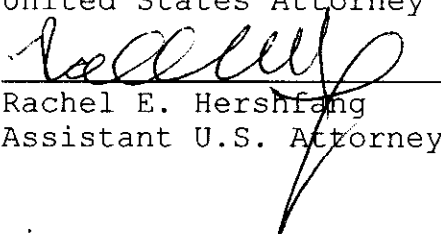
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later decide to change his plea.

Very truly yours,

MICHAEL J. SULLIVAN  
United States Attorney

By:

  
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Rachel E. Hershfang  
Assistant U.S. Attorney

cc: Mr. Robert Alba,  
Clerk to the Hon. Patti B. Saris  
Denise Jefferson Casper